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VIA ECF

The Honorable Analisa Torres, U.S.D.J.
U.S. District Court, Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Staffing Global Corp. v. B2C2 USA Inc. et al*
Case No.: 23-cv-3101

Dear Honorable Judge Torres:

This law firm represents Plaintiff Staffing Global Corp. (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Order dated July 12, 2023 [Dckt. No. 16] and Your Honor’s Individual Motion Practice Rule I(C), this letter respectfully requests a one (1) month extension of time to file a proposed case management plan through and including August 28, 2023. This is the second request of its nature. The original date for the submission of the proposed case management plan was on June 12, 2023. As counsel to defendants B2C2 Limited and B2C2 USA Inc. (together, the “Defendants”) has been on vacation, the Plaintiff has not obtained the consent of the Defendants.

The basis for the request is that the parties are in the process of exchanging pre-motion letters under Your Honor’s special rules for motions to dismiss, pursuant to Your Honor’s Individual Motion Practice Rule III(B)(ii) and (iii). The Plaintiff’s response to the Defendants’ pre-motion dismissal letter involves an amendment to the Complaint that would add a new party, which would require the newly joined party’s involvement in the proposed case management plan.

This letter further serves as a status update in accordance with Your Honor’s Order dated July 12, 2023 [Dckt. No. 16]. Counsel to the parties have had several discussions concerning settlement and the Plaintiffs have submitted documents to the Defendants’ counsel in connection with the settlement discussions. The parties have not settled the instant matter.

As set forth above, the parties are in the process of exchanging pre-motion letters under Your Honor’s special rules for motions to dismiss. The Plaintiff intends to provide the Defendants with a proposed amended complaint within the next two (2) weeks.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

GRANTED.

SO ORDERED.

Dated: July 27, 2023
New York, New York



ANALISA TORRES
United States District Judge